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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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SOUTHERN CALIFORNIA EDISON COMPANY AND ITS ASSIGNEES- APPLICATION IN CONFORMANCE WITH THE REQUIREMENTS OF A.R.S. 40-360.03 AND 40-360.06 FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING CONSTRUCTION OF A 500KV ALTERNATING CURRENT TRANSMISSION LINE AND RELATED FACILITIES IN MARICOPA AND LA PAZ COUNTIES IN ARIZONA ORIGINATING AT THE HARQUAHALA SWITCHYARD WEST OF PHOENIX, ARIZONA AND TERMINATING AT THE DEVERS SUBSTATION IN RIVERSIDE COUNTY, CALIFORNIA.

DOCKET NO.

L-00000A-06-0295- 00130

Arizona Corporation Commission
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COMMENTS OF SOLARMISSION
TECHNOLOGIES INC.

SolarMission Technologies, Inc. ("SolarMission") submits the following comments in support of Southern California Edison Company's application for a Certificate of Environmental Compatibility in the above-referenced matter.

I. Introduction.

On May 1, 2006, the Southern California Edison Company ("SCE") filed an Application for a Certificate of Environmental Compatibility ("CEC") with the Arizona Power Plant and Line Siting Committee ("Line Siting Committee"). The

1 Application sought approval for construction of a 500 kV alternating current
2 transmission line and related facilities in Maricopa and La Paz Counties known as the
3 Devers II Line ("Devers II Transmission Line"). On May 2, 2006, the Chairman of
4 the Line Siting Committee issued a Notice of Hearings in the matter. Various parties
5 intervened. The Line Siting Committee then held fifteen days worth of hearings
6 between June 26, 2006 and February 28, 2007.

7 On March 21, 2007, the Line Siting Committee submitted for filing with the
8 Arizona Corporation Commission its Decision and Certificate of Environmental
9 Compatibility ("CEC") in the above-captioned matter. The Utilities Division Staff
10 and the Sierra Club-Grand Canyon Chapter petitioned on April 9th and April 4th
11 respectively, for review of the CEC issued by the Line Siting Committee.

12 SolarMission believes that construction and operation of the Devers II
13 Transmission Line will help spur development of large scale solar resources in
14 western Arizona and therefore supports the decision of the Line Siting Committee to
15 issue the CEC.

16 **II. Discussion.**

17 SolarMission¹ owns the license to the Solar Tower large-scale renewable energy
18 technology. The technology is based on the concept developed by renowned German
19 structural engineer Professor Jörg Schlaich, founder and principal of leading
20 structural engineers, Schlaich Bergermann and Partners.

¹ On March 16, 2007 the Boards of Directors of EnviroMission Limited and SolarMission Technologies, Inc agreed to consolidate the two companies. EnviroMission is a publicly traded company, trading on the Australian Stock Exchange under the symbol "EVM" and within the United States as a fully sponsored American Depositary Receipt (ADR) by the Bank of New York under the symbol "EVOMY". The merger, subject to shareholder and regulatory approval, will make EnviroMission the sole solar tower developer globally.

1 The Solar Tower operates on the simple principle- hot air rises; the movement of
2 rising hot air is utilized to drive turbines to generate electricity. The concept uses
3 solar radiation to heat air beneath a large translucent collector to create a constant
4 flow of heated air to drive electricity-generating turbines. The turbines are located at
5 the base of a tall tower in the center of the collector, and the movement of the heated
6 air through these turbines is increased by the updraft effect created by the tower.

7 The solar tower can produce electrical generation in large-scale quantities, up to
8 200MW at high capacity factors when compared to other renewable power sources
9 and may be a competitive alternative to coal and gas based electricity generation.

10 SolarMission has been actively developing potential sites for solar towers in the
11 southwestern United States including a site in western Arizona north of the proposed
12 Devers II Transmission Line. Ultimately the western Arizona site may contain
13 approximately 1600MW in capacity of solar generation with significant energy output
14 factors.

15 SolarMission notes that there is limited to no transmission capacity available on
16 other high voltage or extra high voltage transmissions systems in western Arizona.²

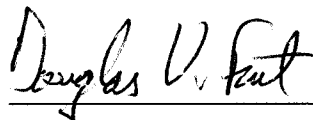
17 As noted in the Arizona Corporation Commission's Fourth Biennial Transmission
18 Assessment for 2006-2105 in Sections 6.2.4.1 that the Mohave area extra high
19 voltage and high voltage systems "are contracted to their limits".

² SolarMission has determined that there is some limited firm southbound capacity on the Mead-Phoenix Transmission Line. However the available firm capacity would not support development of a single solar tower.

1 Western Arizona enjoys excellent insolation factors³ and will likely be the scene
2 of much solar energy development. The capacity and energy available from large-
3 scale solar projects such as SolarMission's western Arizona project will need access
4 to southwestern energy markets. The proposed Devers II Transmission Line will
5 provide excellent bi-directional transmission access to both Arizona and California
6 markets for that solar energy production.

7 **III. Conclusion.** The proposed Devers II Transmission Line is a key element in
8 the development of large scale solar resources in western Arizona. SolarMission
9 supports the Line Siting Committee decision and encourages the Commission to
10 approve the CEC for the project.

11
12 Respectfully submitted this ____ day of May 2007.

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15 

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23 The original and 25 copies
24 of the foregoing have been filed
25 as of May 26, 2007 with:

26
27 Docket Control
28 Arizona Corporation Commission

³ See *The Renewable Energy Atlas of the West* at
http://www.energyatlas.org/more_info/data_methodologies.asp

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4 Copies of the foregoing have
5 been mailed, faxed, or trans-
6 mitted electronically as of
7 January 22, 2007 to:

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10 **COPY** of the foregoing mailed/served electronically
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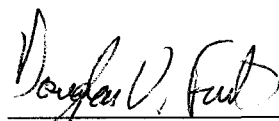
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